

JP:NS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

11-1145 M

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

KIARA PERALTA POLANCO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

ILIANA PAGAN, being duly sworn, deposes and states that she is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about November 19, 2011, within the Eastern District of New York and elsewhere, defendant KIARA PERALTA POLANCO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:¹

1. On or about November 19, 2011, KIARA PERALTA POLANCO arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue flight #812 from Puerto Plata, Dominican Republic.

2. Defendant KIARA PERALTA POLANCO was selected for a Customs and Border Protection ("CBP") examination. During the examination, the defendant presented one black suitcase for inspection and admitted that its contents belonged to her. During the following routine inspection of her luggage, the inspector noticed that the sides and bottom of the suitcase were unusually thick. The inspector peeled back a portion of the bag's liner, revealing a silver package glued to the inside of the suitcase. The contents of the silver package field-tested positive for the presence of cocaine. Defendant KIARA PERALTA POLANCO was then placed under arrest.

3. The total approximate gross weight of the cocaine found in defendant KIARA PERALTA POLANCO's suitcase is 2,889.5 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant KIARA PERALTA POLANCO be dealt with according to law.

S/ Iliana Pagan

ILIANA PAGAN
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
21st day of November, 2011

s/ Andrew Carter

THE HONORABLE ANDREW L. CARTER
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK